THRIVE FAMILY OFFICE (PTY) LTD

(“THRIVE” OR “COMPANY”)

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

(“PAIA”)

VERSION 2: APRIL 2024

THRIVE
FAMILY OFFICE

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1. "**CEO**" Chief Executive Officer

1.2. **"DIO"** Deputy Information Officer;

1.3. **"FSP"** Financial Services Provider

1.4. **"IO"** Information Officer;

1.5. **"Minister"** Minister of Justice and Correctional Services;

1.6. **"PAIA"** Promotion of Access to Information Act No. 2 of 2000(as Amended);

1.7. **"POPIA"** Protection of Personal Information Act No.4 of 2013;

1.8. **"Regulator"** Information Regulator; and

1.9. **"Republic"** Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1. Check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2. Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

2.3. Know the description of the records of the body which are available in accordance with any other legislation;

2.4. Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

2.5. Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6. Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7. Know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8. Know the recipients or categories of recipients to whom the personal information may be supplied;

2.9. Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10. Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT PERSONS FOR ACCESS TO INFORMATION OF THRIVE FAMILY OFFICE (PTY) LTD

3.1. Chief Information Officer:

Name: Aidan Timothy Morgan Lotz

3.2. Deputy Information Officer:

Name: Marc le Sueur

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THRIVE FAMILY OFFICE (PTY) LTD

4.1. Access to information general contacts

Email: Compliance@thrivefo.co.za

4.2. National or Head Office

Physical & Postal Address: 6 Vickie Avenue, Sunset Acres, Johannesburg, Gauteng, 2196

Email: Compliance@thrivefo.co.za

Website: www.thrivefo.co.za

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

5.2. The Guide is available in each of the official languages and in braille.

5.3. The aforesaid Guide contains the description of: -

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

5.3.3. the manner and form of a request for-

5.3.3.1. access to a record of a public body contemplated in section 11[3]; and

5.3.3.2. access to a record of a private body contemplated in section 50[4];

5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

5.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

5.3.6.1. an internal appeal;

5.3.6.2. a complaint to the Regulator; and

5.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

5.3.7. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

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[1] Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

[2] *Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

[3] *Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

[4] *Section 50(1) of PAIA- A requester must be given access to any record of a private body : -*

a) that record is required for the exercise or protection of any rights;

b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

[5] *Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

[6] *6 Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

5.3.8. the provisions of sections 15[7] 7and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

5.3.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

5.3.10. the regulations made in terms of section 92[11].

5.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

5.5. The Guide can also be obtained-
5.5.1. upon request to the Information Officer;
5.5.2. from the website of the Regulator (https://www.justice.gov.za/inforeg/).

5.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
5.6.1. English
5.6.2. Afrikaans

6. CATEGORIES OF RECORDS OF THRIVE FAMILY OFFICE (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Thrive may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the Gazette. The identified entities have not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at www.thrivefo.co.za .

Category of Records	Types of the Record	Available on Website	Available upon request
PAIA Manual	PDF	X	X

[7] *Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.*
[8] *Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.*
[9] *Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*
[10] *Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*
[11] *Section 92(1) of PAIA provides that – "The Minister may, by notice in the Gazette, make regulations regarding-*
a) any matter which is required or permitted by this Act to be prescribed;
b) any matter relating to the fees contemplated in sections 22 and 54;
c) any notice required by this Act;
d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

7. DESCRIPTION OF THE RECORDS OF THRIVE FAMILY OFFICE (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

All records kept and made available in terms of legislation applicable to any of the entities listed in this Manual and the Financial Services Industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THRIVE FAMILY OFFICE (PTY) LTD

We set out below the subjects and categories of records that are, subject to access being denied as set out in the Act, available for the purposes of the Act:

Subjects of which the Body holds records	Categories of Records
Administrative records	The following are considered to include but not to be limited to records, which pertain to Thrive own affairs: • FSP license • FSP compliance manual • FSP policies • FSP internal rules and procedures • Any personal records provided to the FSP by its personnel • Any records which a third party has provided to the FSP about any of its personnel
Personnel/Human Resource records	• Any personal records provided to Thrive by their personnel • Any records a third party has provided to Thrive about any of their personnel • Conditions of employment and other personnel-related contractual and quasi-legal records • Internal evaluation records • Other internal records and correspondence
Client related records	Any records a third party has provided to Thrive and records generated by or within Thrive pertaining to the client. Including:

	• Transactional records • Advice records • Operational records • Internal correspondence • Product records • Statutory records • Internal policies and procedures • Securities and Equites • Other
Financial records	The following are considered to include but not to be limited to records, which pertain to Thrive own affairs: • Financial Statements • Audit records

Records in the possession of or pertaining to other parties	Thrive may possess records pertaining to other parties, including without limitation: contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers.
	
	Alternatively, such other parties may possess records, which can be said to belong to Thrive.
	
	The following records fall under this category:
	
	• Personnel, Client or Financial Services Provider records which are held by another party as opposed to being held by Thrive; and
	• Records held by Thrive pertaining to other parties, including without limitation: Financial records, Correspondence, Contractual records, Records provided by the other party, and
	• Records third parties have provided about the suppliers:
	  ○ Service Level Agreement;
	  ○ Financial records; or
	  ○ Correspondence

9. PROCESSING OF PERSONAL INFORMATION

9.1. Purpose of Processing Personal Information:

9.1.1. Providing advice and intermediary services to clients in respect of Short-term Insurance, Long-term Insurance, Retirement products and Investments to our clients.

9.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto:

Categories of Data Subjects	Personal Information that may be processed
Customers/Clients	Names, registration number, Vat number, Address, employment status and bank details
Service Providers	Names, registration number, Vat number, Address, trade secrets and bank details
Employees	Address, qualifications, gender and race

9.3. The recipients or categories of recipients to whom the personal information may be supplied:

Category of Personal Information	Recipients or Categories of Recipients to whom the personal information may be supplied
ID number and names – for criminal checks	South African Police Service
Qualifications, for qualification verifications.	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

9.4. Planned transborder flows of personal information.

9.4.1. Outlook 365- all documents are cloud based and only documents for which hard copies are absolutely necessary are kept in hard copy. Outlook 365 is a cloud based platform which may store information outside of South Africa.

9.4.2. Mandatory multi-factor authentication to ensure client confidentiality.

9.5. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.

8.5.1 Outlook 365- all documents are cloud based and only documents for which hard copies are absolutely necessary are kept in hard copy. Outlook 365 is a cloud based platform which may store information outside of South Africa.

8.5.2 Mandatory multi-factor authentication to ensure client confidentiality.

8.5.3 The power of Microsoft's security systems is relied on.

10. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

10.1. Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;

10.2. Mandatory protection of the commercial information of a third party, if the record

contains:

10.2.1. Trade secrets of that third party;

10.2.2. Financial, Commercial, Scientific or Technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and

10.2.3. Information disclosed in confidence by a third party to Thrive, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

10.3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;

10.4. Mandatory protection of the safety of individuals and the protection of property;

10.5. Mandatory protection of records which would be regarded as privileged in legal proceedings;

10.6. The Commercial activities of Thrive, which may include:

10.6.1. Trade secrets of Thrive;

10.6.2. Financial, Commercial, Scientific or Technical information which disclosure could likely cause harm to the financial or commercial interests of Thrive;

10.6.3. Information which, if disclosed, could put Thrive at a disadvantage in negotiations or commercial competition; or

10.6.4. A computer program which is owned by Thrive and which is protected by copyright.

10.7. The research information of Thrive or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage; or

10.8. Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

11. REQUESTS & DECISION

11.1. Anyone requiring access to information held by Thrive must request the prescribed form (Request Form) from the Information Officer and submit such form electronically via the email address or physically at the physical address noted in paragraph 3 above and pay a requested fee and a deposit, if applicable as contained in Annexure B of the PAIA Act 2000.

11.2. The prescribed form must be completed with sufficient particulars to at least enable the Information Officer to identify:

11.2.1. The record or records requested;

11.2.2. The identity number of the requester;

11.2.3. The form of access required, if the request is granted;

11.2.4. The contact details of the requester;

11.2.5. The right the requester is seekng to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right;

11.2.6. if, in addition to a written reply, the requester wishes to be informed of the decision on the request in any other manner, to state that manner and the necessary particulars to be so informed;

11.2.7. If the request for information made on behalf of another person, submitted proof that the person submitting the request, has obtained the necessary authorization to do so.

11.3. Thrive will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

11.4. The 30 day period with which Thrive has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the request is for a large number of information, or the request requires a search for information held at another office of Thrive and the information cannot reasonably be obtained within the original 30 day period.

11.5. The Information Officer will notify the requester in writing should an extension be sought. The requester will be informed in writing whether access has been granted or denied.

11.6. If, in addition, the requester requires the reasons for the decision in any other manner, he must state the manner and the particulars so required.

11.7. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

11.8. The requester must pay the prescribed fee, before any further processing can take place.

12. AVAILABILITY OF THE MANUAL

12.1. A copy of the Manual is available-

12.1.1. on Thrive's website- www.thrivefo.co.za;
12.1.2. at the head office of the Thrive for public inspection during normal business hours;
12.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
12.1.4. to the Information Regulator upon request.

11.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

13. UPDATING OF THE MANUAL

The PAIA Manual will be regularly reviewed, internally or by an outside party such as an auditor or compliance officer, and where necessary, updated to ensure that the arrangements remain adequate to identify, assess, evaluate and successfully control access to information.

Issued by

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Aidan Lotz (Chief Information Officer & Key Individual)

on behalf of Thrive Family Office (Pty) Ltd